

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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|---|---|--------------------------------|
| STEVEN HOTZE, MD., <i>et al.</i> , | § | |
| Plaintiffs, | § | Civil Action No. 4:20-cv-03709 |
| v. | § | |
| | § | |
| CHRIS HOLLINS, in his official capacity | § | |
| as Harris County Clerk, | § | |
| Defendant. | | |

**MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF
ON BEHALF OF THE TEXAS COALITION OF BLACK DEMOCRATS**

Movant Carvana Cloud seeks leave to file on behalf of the Texas Coalition of Black Democrats as *Amicus Curiae* in opposition to Plaintiff's motion for emergency injunctive relief.

Carvana Cloud is the Director of Voter Protection for the Texas Coalition of Black Democrats. The Texas Coalition of Black Democrats submits this brief on behalf of Black voters. This brief was not authored by either party's counsel. No money was contributed to fund preparing this brief. As an organization the Texas Coalition of Black Democrats is a political organization that seeks to end poverty, hunger, homelessness, race-based health disparities, the racial wealth-income-and education gap. The Coalition uses politics to address these issues by increasing voter engagement and holding candidates accountable for protecting and enhancing voting rights. The Coalition's mission is to protect and empower Black Democratic voters and the officials we elect as well as advancing an agenda focused on justice, opportunity, equity and economic prosperity. The Texas Coalition of Black Democrats is able to provide unique insight on Black voters in Texas.

Movant's proposed brief is attached as Exhibit A. In this brief, Ms. Cloud argues that ending drive-thru voting and disregarding the thousands of votes already cast will have a

disparate effect on Black voters and their ability to voice their opinions in this election. A proposed order is attached as Exhibit 2.

Dated this 2 day of November 2020.

Respectfully submitted,

/s/ Carvana Cloud

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Counsel for Amicus Curiae

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing via e-service on November 2, 2020 in accordance with the Federal Rules of Civil Procedure.

/s/ Carvana Cloud

Carvana Cloud

CERTIFICATE OF CONFERENCE

I hereby certify that I have contacted counsel for the parties by electronic mail on November 2, 2020 to seek their consent to file this *Amicus Curiae* brief. Defendant Chris Hollins has provided consent. I have not received a response from the Plaintiffs.

/s/ Carvana Cloud

Carvana Cloud